

AO 91 (Rev. 08/09) Criminal Complaint

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

FEB - 7 2015

David J. Bradley, Clerk

United States of America

Marco ZUMAYA-Gallegos<sup>v.</sup> MX YOB:1959

Case No. M-15-195-M

Defendant(s)

## CRIMINAL COMPLAINT

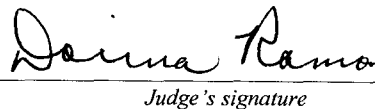
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 02/06/2015 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:21 USC 841 *Code Section*  
21 USC 846*Offense Description*  
Knowingly and intentionally possess with intent to distribute approximately  
16.74 kilograms of cocaine, a Schedule II controlled substance, and did  
knowingly and intentionally conspire to possess with intent to distribute 16.74  
kilograms of cocaine, a Schedule II controlled substance.This criminal complaint is based on these facts:  
See Attachment "A"

✓ Continued on the attached sheet.

  
Complainant's signatureNathan Stoltz, HSI Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date: 2/7/2015  
Judge's signatureCity and state: McAllen, TexasDorina Ramos, U.S. Magistrate Judge  
Printed name and title

Attachment "A"

On February 6, 2015, Homeland Security Investigations, Office of the Assistant Special Agent in Charge McAllen, Texas (HSI McAllen) Special Agents (SAs) were notified of a cocaine seizure at the Hidalgo, Texas Port of Entry (POE).

Customs and Border Protection Officers (CBPOs) at the Hidalgo, Texas POE referred a Dodge Caravan, bearing Mexico License Plate number 835TPV6 driven by Marco ZUMAYA-Gallegos, to secondary inspection for additional examination. A narcotic detector dog (NDD) inspection of the vehicle resulted in an alert. A Gamma-ray inspection of the vehicle revealed anomalies in the rear quarter panels. Further inspection revealed 15 bundles totaling 16.74 kilograms of a substance that field tested positive for cocaine inside the rear quarter panels. HSI SAs responded to the Hidalgo POE to interview ZUMAYA. ZUMAYA waived his rights, both orally and in writing.

ZUMAYA stated the vehicle was his and he knew there were narcotics in the vehicle. ZUMAYA stated he was smuggling the narcotics for a subject in Mexico that he knew only as MARIO. ZUMAYA stated MARIO was going to pay him \$3,000.00 for smuggling the narcotics into the United States.

AUSA Toni Trevino was advised of the facts of the case and authorized federal prosecution on ZUMAYA.